INTRODUCTION

A. EXECUTIVE SUMMARY

This document is the California Energy Commission's Presiding Member's Proposed Decision (PMPD).[1] The Energy Commission has exclusive jurisdiction in California over the licensing of power plants that are 50 megawatts (MW) or more. The Commission appointed a Committee of two Commissioners to review the proposed power plant project. This PMPD contains the Committee's determinations regarding Calpine C* Corporation's (Calpine or Applicant) Application for Certification (AFC) for the Los Esteros Critical Energy Facility (LECEF)[2], a 180 MW simple-cycle, gas-fired power plant in the City of San Jose. The PMPD includes the findings and conclusions required by law, and it is based exclusively on the evidentiary record established at the hearings on the application. The document contains the Committee's reasons supporting its PMPD and references to portions of the record, which support the Committee's findings and conclusions.[3]

As proposed, the LECEF will serve as a mitigation project for the U.S. DataPort (USD) Planned Development Zoning Project (PDZ), which was approved by the City of San Jose at a City Council Meeting on April 3, 2001. LECEF is planned as Phase 1 of the three-phase USD project, a 2.227 million gross-square-foot

---

[1] The requirements for the Presiding Member's Proposed Decision are set forth in the Commission's regulations, Title 20, California Code of Regulations, sections 1749 through 1754. Requirements for the Revised PMPD are found in Title 20, California Code of Regulations, section 1753. The Final Decision is described in section 1755.

[2] Applicant is proposing to construct and operate the LECEF near the intersection of State Route 237 and Zanker Road, at 1515 Alviso-Milpitas Road, within San Jose City limits in Santa Clara County, California. Zanker Road will connect to an access road that will lead to the power plant area.

[3] References to the evidentiary record, which appear in parentheses following the referenced material, may include an exhibit number and/or a reference to the date, page and line number(s) of the reporter's transcript e.g., (Ex. 2, p. 55; 3/11/02 RT 123:8-124:3.) Evidentiary Hearings were conducted on March 11 and May 20, 2002.

Internet data center. Phase II would convert the LECEF to a combined-cycle power plant[4] by adding four heat recovery steam generators, two steam turbine generators, and associated accessory equipment for a generation capacity of approximately 260 MW. (Ex. 1H.) Phase III would include the installation of equipment and systems for the planned USD "Super Hub" Server Farm. (3/11/02 RT 307:19-308-23; Ex. 1, p. 4.5-10.)

Before the San Jose City Council approved the current design of the USD PDZ, a previous proposal included four dual-fuel-fired, 10-MW turbines and approximately 90 diesel backup generators (two MW each) for emergency power and backup generation. The City of San Jose sought a more efficient, modern, and less polluting energy producing facility than one using 90 diesel generators. The Applicant proposed LECEF to the Energy Commission as the environmentally superior alternative.[5] (3/11/02 RT 307:14-309-16; Ex. 1, p. 1.1.; 5/20/02 RT 280:7, 281:15.)

Several Intervenors actively participated in the Commission's evidentiary hearings on the LECEF project by cross-examining witnesses, and/or presenting witnesses and documentary evidence of their own. These active Intervenors include the:

- City of Milpitas (Milpitas);
- Coalition of Ratepayer and Environmental Groups (the Coalition); and
- T.H.E. P.U.B.L.I. C, William J. Garbett, Agent.

Both Milpitas and the Coalition were represented in the proceedings by counsel of record. Milpitas was particularly concerned about LECEF's potential impacts

---

[4] Conversion to combined cycle or shutdown is required by law. (Public Resources Code § 25552.)

[5] Applicant's May 3, 2002, Petition for Review includes a copy of the March 15, 2001, settlement agreement between the Energy Commission and the Applicant regarding a jurisdictional dispute over the diesel generators. The jurisdictional agreement discusses the Central Reliability Energy Center (CREC), LECEF's predecessor. (5/20/02 RT 9:19-10:10.)

on Visual Resources. The Coalition focused its presentation on the topic of Transmission System Engineering. The Coalition participated in all phases of our proceedings. Mr. Garbett, who is not an attorney, appeared in a representative capacity only. Mr. Garbett, an agent for an organization described as "T.H.E. P.U.B.L.I.C.," produced no witnesses but did participate in a limited way at the March 11, 2002 Evidentiary Hearing. The Californias Unions for Reliable Energy (CURE) intervened but did not participate in the Evidentiary Hearings. (3/11/02 RT 3:25-4-23.)

In addition to the formal Intervenors named above, there were a number of public officials and members of the public who participated to offer support or opposition to the project. For example, in a March 8, 2002, letter to the Committee, the Mayor of San Jose, Ron Gonzales, indicated support for the LECEF project. Mayor Gonzales considers LECEF as an integral part of the larger and adjoining USD PDZ. He notes with approval that LECEF's current design:

- Eliminates 90 diesel backup generators;
- Includes an environmentally superior natural gas fired power plant; that
- Provides peaking power to the grid in an area of critical need before USD's buildout;
- Makes USD energy self-sufficient after its buildout, and
- Provides an economic benefit for the economy of San Jose and the Silicon Valley. (3/11/02 RT 343:15-345-13.)

Mr. Grant Sedgwick, who is president and a founder of the USD company, offered public comment on the status of the USD project[6] Mr. Sedgwick informed the Committee that the USD project is 12 to 18 months behind schedule, having only obtained a conditional contract to purchase the property but lacking financing and tenants. Once construction begins, it will take from three to five years to completely build out the USD project, depending on the

[6] When constructed, USD will virtually surround and provide additional screening for the LECEF. (Ex. 1, Figure 9.)

economic climate in the technology/telecommunications industry at the time. (3/11/02 RT 29:7-46-22 *see* our section on **Land Use.** *infra*.)[7]

Members of the public who support the project presented public comment at the March 11, 2002 Hearing. Mr. Dean Baird, a concerned citizen who performs public service work in the community of Alviso, commented favorably on the benefits of the facility to the local area environment and economy as compared to any larger manufacturing facility with its attendant traffic and congestion issues. (3/11/02 RT 335:1-339:6.)

Mr. Jim Cunneen, a former California Assemblyman and current president/CEO of the San Jose Silicon Valley Chamber of Commerce (Chamber), spoke in favor of the LECEF project on the Chamber's behalf. Mr. Cunneen views the project as a "total win" for the business community in the Silicon Valley. He asserted that the LECEF project is consistent with the City of San Jose's energy independence plan. He commented on the special relationship between the LECEF and USD projects in terms of the virtual elimination of back-up diesel-fired generators. (3/11/02 RT 339:7-340-21.)

Mr. Jose Garcia, representing the Building Trades Council, testified in support of the project on behalf of union-represented construction workers. Mr. Garcia commented that the LECEF project would reinvigorate the local economy in terms of its capacity for construction and operations employment for area workers. (3/11/02 RT 340:24-342-1.)

Finally, Richard Santos, a lifetime resident of the community of Alviso and a Director of the Santa Clara Valley Water District, spoke in favor of the LECEF project. Mr. Santos commented on Calpine and USD's active involvement in the Alviso community to garner local support for the projects by addressing

community concerns. Mr. Santos stated his opinion that the developers had addressed the concerns of the local citizenry and their political representatives. He concluded that the LECEF and USD projects would provide a valuable economic stimulus for the community. (3/11/02 RT 342:4-343-9.)

By contrast, Milpitas and the other active Intervenors opposed the LECEF project. At the March 11, 2002, Evidentiary Hearing, the Mayor of Milpitas, Henry Manayan, presented public comment articulating the City's opposition to the LECEF project.

According to Mayor Manayan, LECEF in its current configuration without USD creates a significant unmitigated visual impact at Milpitas' western border.[8] Milpitas has invested millions of dollars to create a high-tech friendly city and to encourage high-tech investments therein. In the absence of the USD PDZ facility, the LECEF project would be completely objectionable as an unscreened continuation of the heavy industrial use on Milpitas' western border. Milpitas, however, would have no objection to a synchronized LECEF/USD development or one where LECEF was conditioned on an architecturally superior design. (3/11/02 RT 245:25-251-4.)

At the May 20, 2002, Evidentiary Hearing, the Committee received draft settlement documents reflecting a tentative agreement between Applicant and Milpitas. These documents reflect that Applicant has allocated up to $2,000,000 for architectural treatment of the LECEF facility. (Ex. 8.) The tentative agreement provides for enhanced landscaping and architectural treatment for LECEF. (5/20/02 RT.)

---

[7] We note that the evidence of record establishes that the LECEF and USD's PDZ were approved as a single project with LECEF providing energy resources to USD. (3/11/02 RT 312:9-313-4.)

[8] LECEF's proposed site is located in north San Jose just west of Coyote Creek, which forms Milpitas' western boundary and separates the two cities. (3/11/02 RT 246:6-22.)

At the Committee Conference on June 24, 2002, Applicant informed the Committee that a final agreement had been reached with Milpitas. (6/24/02 RT 32:1-4:13; Ex. 10.) In light of the final agreement, we conclude that LECEF will have no unmitigated significant impact, and that it will comply with all laws, ordinances, rules and standards (LORS) regarding Visual Resources.

B. LECEF

If licensed, LECEF will be a nominal 180-MW, simple-cycle power plant. The proposed facility will include:

- four combustion turbine generators (CTGs) equipped with water injection and spray intercooling injection (SPRINT) to control oxides of nitrogen (NOx);
- additional emissions control equipment; and
- associated support equipment.[9]

Eventually, underground transmission cables will convey electricity from LECEF to the planned PG&E Los Esteros Substation located adjacent to the LECEF and USD PDZ site.[10]

Natural gas supply to the CTG's would flow through a 10-inch line connection to the PG&E pipelines 101 and 109 at the southern end of the LECEF property near State Route (SR) 237. The four CTG's would require approximately 45,397 MMBTUs of natural gas per day. For reliability purposes, the project would

[9] As discussed above, the LECEF will be constructed in three phases, comprised initially of four, natural-gas-fired, simple cycle combustion turbines to produce a nominal 180 MW generation output, which is the subject of this PMPD. The subsequent phases still under evaluation are proposed to add steam-generating capabilities that will increase the project's nominal output to 260 MW, as well as modifications to enhance reliability and availability. The project owner would be required to file an Amendment to the AFC or a new AFC for the combined cycle phase of the project.

[10] Until PG&E constructs the substation, the project will rely on a temporary transmission connection via a 2000-foot aboveground "tap-line" that will interconnect with an existing 115 kV

connect to each of the two main PG&E gas pipelines. Gas would be pressurized by onsite compressors as needed, and flow through scrubbing and filtering equipment to a gas pressure control and flow metering stations prior to entering the combustion turbines.

The San Jose/Santa Clara Water Pollution Control Plant (WPCP) would supply the facility with recycled water through the auspices of the South Bay Water Recycling program. A recycled water pipeline approximately 1,000-feet long, will connect to an existing WPCP pipeline at a point parallel to SR 237. The facility will use recycled water for all cooling and combustion systems. Peak water consumption on a hot day, at full-load operation, totals about 566 gallons per minute, or about 820,000 gallons per 24-hour day.[11]

Trucked water delivery will provide potable water; LECEF will not have a potable water pipeline because the City of San Jose's municipal water supply does not extend to the site. Discharged treated process water will be diverted to an existing WPCP line at a point near Zanker Road by way of a 2,700-foot waste discharge line to be constructed along the proposed access road.

C. EXPEDITED PROCESSING UNDER PUBLIC RESOURCES CODE, SECTION 25552[12]

Calpine filed its AFC under our four-month process on August 7, 2001, anticipating completed project construction and production initiated during the summer of 2002. (Pub. Res. Code, § 25552.) Section 25552 requires the Energy Commission to expedite, to the extent feasible, the processing of AFCs

---

line at Zanker Road. For a fuller description of the project, see our section, *infra*, entitled **PROJECT DESCRIPTION**.

[11] Peak water use under such conditions would approximate 917 acre-feet-per-year (based upon an assumption of round the clock operation for a year). Approximately 42 percent of the total water requirements would be for water injection to control NOx emissions; cooling towers makeup water will consume the balance.

[12] Herein, all references to section 25552 refer to the Public Resources Code.

for projects such as LECEF that are expected to be online by December 31, 2002.

Qualification and licensure for the four-month process contemplated by section 25552 requires an AFC to demonstrate that the simple-cycle, thermal powerplant and related facilities will:

1. not be a major stationary source or a modification to a major stationary source under the federal Clean Air Act;
2. be equipped with best available control technology (BACT);
3. not have a significant adverse effect on the electrical system as a result of construction or operation;
4. provide a contract with a general contractor for the provisions of skilled labor to construct, operate and maintain the facility;
5. not have a significant adverse effect on the environment as a result of construction or operation;
6. assure protection of public health and safety;
7. comply with all applicable federal, state, and local laws, ordinances, and standards (LORS);
8. provide a reasonable demonstration that the project will be in service before December 31, 2002;
9. provides for a binding and enforceable agreement with the Energy Commission that demonstrates either
   (a) that the project will cease to operate, and its permit will terminate within three years, or
   (b) that within a period of three years, it will be recertified, modified, removed or replaced, with a cogeneration or combined-cycle thermal powerplant that (1) uses (BACT), (2) obtains necessary offsets according to the stated ratio (and consistent with federal law and regulation) or, where offsets are unavailable, pay an air emissions mitigation fee to the air pollution control district or air quality management district based upon actual emissions, for expenditure by the district under Section 44275 of the Health and Safety Code, to mitigate the emissions from the plant, and, (3) complies with all LORS. (Pub. Res. Code, §§ 25552 (d) & (e), and citing Pub. Res. Code § 25523.) [BACT, offsets, and LORS

compliance are gauged according to standards applicable at the time of construction.] [13]

On November 15, 2001, the Committee extended the LECEF schedule to accommodate required discovery and reports from sister agencies.[14] After our Prehearing Conference, Applicant filed a petition and several motions that requested the Committee to:

(a) Issue a Committee Schedule that allows for a Final Commission Decision on the Application for Certification (AFC) no later than April 17, 2002;

(b) Authorize certain pre-construction activities that are enumerated in the Petition as follows:

- Mobilize Construction Trailers – this activity involves leveling an approximately 5 to 7 acre area, placing gravel over the area for dust and mud control, moving and parking construction trailers onto the site and obtaining power and telephone service including the installation of approximately two 25 foot power poles;

- Establish Parking Area – the activity involves leveling an approximately 5 acre area, placing gravel to control dust and mud, establishing best management practices for erosion control as described by the construction Storm Water Pollution Prevention Plan (hay bales, silt fences, wattles, etc);

- Establish Construction Laydown – this activity involves leveling an approximately 10-15 acre area, placing gravel to control dust and mud, establishing best management practices for erosion control as described by the construction Storm Water Pollution Prevention Plan (hay bales, silt fences, etc), and staging plant equipment and construction materials, and parking construction equipment;
- Excavate power block and cooling tower foundations;
- Excavate underground utility trench;

---

[13] For ease of reference, all of the Committee's prior rulings in this matter are set forth in Appendix E.

[14] Section 25552 is flexible in its application to the extent that it expressly provides that the process may be extended beyond four months to "any later time mutually agreed upon by the commission and the applicant, provided that the thermal powerplant and related facilities remain likely to be in service on or before December 31, 2002." (Pub. Res. Code § 25552 (c).)

- Set conduit in underground utility trench;
- Set reinforcing steel bars in power block and cooling tower foundations; and
- Set forms around power block and cooling tower foundations.

The Committee summarily denied Applicant's Petition. (Appendix E.) Applicant subsequently filed a motion for reconsideration, which the Committee heard as the first order of business at the March 11, Evidentiary Hearing. (3/11/02 RT 8:2-29: 6; Ex. 4F, p. 53.) On March 21, 2002, the Committee denied the motion for reconsideration upon the identical grounds as the original petition. (See Appendix E.)

In reviewing Applicant's various motions to expedite our process, the Committee was mindful of Applicant's energy contract with the state Department of Water Resources (DWR) for LECEF to supply energy to the grid in 2002. Upon Applicant's request, however, the Committee ruled that the DWR contract as an emergency measure was outside the scope of our proceedings and would not be addressed further. The Committee later applied that ruling at our March 11, Hearing when the Coalition sought, over Applicant's objection, to introduce matters related to energy costs in the DWR contract. (*Cf.* 3/11/02 RT 584:18-586:12 & 638:6-641:11; 645:3-651:4.)

During the March 11, 2002 Hearing, Applicant advocated an expedited schedule, which would call for two, 10-hour shifts--essentially construction around the clock. (3/11/02 RT 572:18-574:5.) In reviewing Applicant's plans to expedite the construction schedule, we concluded that the AFC was ambiguous on the question of 24-hour construction, and that Staff had not evaluated those impacts. In addition, we concluded that Applicant had not carried its burden under section 25552 to demonstrate that LECEF could be in service by December 31, 2002. Therefore, we decided that the AFC should be removed from the four-month process and converted to a 12-month AFC as set forth in Public Resources Code

section 25540.6. (Appendix E.) In concurrent orders dated April 25, 2002, the Committee*, inter alia,* removed the AFC from the four-month process and ordered an Evidentiary Hearing on May 20, 2002

On May 20, 2002, the Committee conducted a supplemental evidentiary hearing to consider additional evidence on the expedited construction schedule and the visual resources issues contested by Milpitas. Staff and Applicant presented evidence on 24-hour construction impacts and the likelihood that the project could be in service by December 31. Thereafter, in an Order dated May 21, 2002, the Committee found that the record, as augmented, supported a finding that Applicant had met its burden under section 25552. Accordingly, we granted Applicant's request to reinstate the AFC to the expedited process set forth in section 25552. (Appendix E.)

D. THE ENERGY COMMISSION'S SITE CERTIFICATION PROCESS

LECEF and its related facilities fall within Energy Commission licensing jurisdiction. (Pub. Resources Code, §§ 25500 et seq.). During its licensing proceedings, the Commission acts as lead state agency under the California Environmental Quality Act (CEQA). (Pub. Resources Code, §§ 25519(c), 21000 et seq.) The Commission's process and associated documents are functionally equivalent to the preparation of an Environmental Impact Report under CEQA. (Pub. Resources Code, § 21080.5.)

The Commission's process is designed to allow the review of a project to be completed within a specified period; a license issued by the Commission is in lieu of other state and local permits. The Commission's certification process provides a thorough and timely review and analysis of all aspects of this proposed project. During the process, we conduct a comprehensive examination of a project's potential economic, public health and safety, reliability, engineering, and environmental ramifications.

Significantly, the Commission's process allows for and encourages public participation so that members of the public may become involved either informally, or on a more formal level as Intervenors with the same legal rights and duties as the project developers. The Commission encourages public participation at every stage of the process.

The process begins when an applicant submits its Application for Certification (AFC). Commission staff reviews the data submitted as part of this AFC and determines whether or not it contains adequate information to permit review to commence; and makes recommended findings to the Commission . Once the Commission determines that an AFC contains sufficient analytic information, it appoints a Committee of two Commissioners to conduct the review process. The Commission also appoints a hearing officer to provide legal assistance to the Committee in each case. This process includes holding public conferences and evidentiary hearings, as well as providing a recommendation to the full Commission concerning a project's ultimate acceptability. The Committee, and ultimately the Commission, serves as fact-finder and decision-maker.

The Commission has a Public Adviser. The role of the Commission's Public Adviser is to assist members of the public and intervenors with their understanding of and participation in the Commission's siting process.

All parties, including the Applicant, Commission staff, and all Intervenors, are subject to the Commission's *ex parte* rule, which prohibits them from communicating on substantive matters with Committee members, other Commissioners, their staffs, and the hearing officer, except for communications which are on the public record.

The initial portion of the certification process is weighted heavily toward assuring public awareness of the proposed project and obtaining such further technical

information as is necessary. During this time, the Commission staff sponsors numerous public workshops at which intervenors, agency representatives, members of the public, Staff, and Applicant meet to evaluate and resolve pertinent issues. Staff then publicizes its initial technical evaluation of the project in the document called the Staff Assessment (SA).[15]

Following completion of the SA and any supplements thereto, the Committee conducts a Prehearing Conference to assess the adequacy of the available information, identify issues, and determine the positions of the various participants. Information obtained from this event forms the basis for a Hearing Order organizing and scheduling formal evidentiary hearings. These hearings are conducted after Staff has finalized its technical evaluation of the project.

At the evidentiary hearings following the release of the final SA all participants that have become formal parties are able to present testimony, under oath or affirmation, which is subject to cross-examination by other parties and to questioning by the Committee. The public may also comment on the proposed project at these hearings. Evidence and public comment adduced during these hearings provide the basis for the decision-makers' analysis.

This analysis appears in a Committee recommendation to the full Commission in the form of a Presiding Member's Proposed Decision, which is available for a public-review period of at least 30 days. Depending upon the extent of revision necessary in response to comments received during this period, the Committee may elect to publish a revised version. If so, this latter document triggers an additional 15-day public comment period. Finally, the full Commission decides whether to accept, reject, or modify the Committee's recommendations at a public hearing.

[15] The SA is equivalent to the "Preliminary Staff Assessment in a 12-month process. After a period of Staff Workshops and comments on the SA, it is enhanced with a Staff Supplement. The

E. PROCEDURAL HISTORY

The Public Resources Code and the Commission's regulations mandate a public process and specify the occurrence of certain necessary events. (Pub. Res. Code, §§ 25500 et seq.; Cal. Code of Regs., tit. 20, §§ 1701, et seq.) The essential procedural elements occurring during the present case are summarized below.

On August 7, 2001, the Applicant submitted its Application for Certification (AFC) Shortly thereafter, Staff sent a "request for agency participation" to those governmental agencies likely to have an interest in the project. On September 25, 2001, the full Commission determined that the Applicant had made its AFC sufficiently informative and complete to commence the expedited review process set forth in Public Resources Code, section 25552.

On October 16, 2001, the Committee noticed its initial event, an "Informational Hearing and Site Visit." The Notice was sent to all known to be interested in the proposed project, including owners of land adjacent to, or in the near vicinity of, LECEF; it was also published in local general circulation newspapers.

On November 5, 2001, the Committee conducted the Informational Hearing and Site Visit in the community of Alviso. There, the Committee and other participants discussed the proposed project, described the Energy Commission's review process, and identified opportunities for public participation. During a temporary adjournment of the hearing, Applicant hosted a tour of the proposed power plant site.

On November 15, 2001, the Committee issued its required Scheduling Order in the form of a "Committee Ruling on Expedited Review and Scheduling Order. Therein, the Committee found that LECEF had the potential to conform to a four-

---

Supplement and the SA are equivalent to the "Final Staff Assessment" in a 12-month process.

month expedited review, as extended by the Committee, subject to further discovery and the filing of required reports from sister agencies.

On December 31, 2001, Staff released its Staff Analysis and afterward held various workshops to receive comments thereon. On February 5, 2002, Staff issued its Supplement to the Staff Analysis. On February 25, 2002, the Committee held a Prehearing Conference.[16] Evidentiary Hearings were scheduled by Notice of Evidentiary Hearings, dated February 25, 2002. On March 11, 2002, according to the Notice of Evidentiary Hearings, the Committee conducted evidentiary proceedings in the City of San Jose.

Thereafter, by concurrent orders dated April 25, 2002, this Committee:

- Converted the AFC review process in this matter from the four-month process established in Public Resources Code section 25552 to the 12-month process set forth in Public Resources Code section 25540.6;
- Reopened the Evidentiary Record for augmentation by the parties; and
- Scheduled a supplemental Evidentiary Hearing on May 20, 2002.

The Committee, after reviewing and compiling the evidentiary record, published this (PMPD) on May 30, 2002. The Committee scheduled June 24, 2002, for the Committee Conference on the PMPD. Based upon the Committee Conference, and the comments received, the Committee elected to issue revisions to the PMPD in the form of an Errata. The Errata has been incorporated into this Final Decision on the LECEF project.

[16] At the Prehearing Conference conducted on February 25, the Committee conducted issue identification with the parties and addressed issues of special concern to the parties such as pending motions. Also discussed were time concerns the Committee had regarding conclusion of the evidentiary proceedings in a single day.

I. PROJECT DESCRIPTION AND OBJECTIVES

SUMMARY OF THE EVIDENCE

Calpine is proposing to construct and operate the LECEF near the intersection of State Route (SR) 237 and Zanker Road, at 1515 Alviso-Milpitas Road, in the City of San Jose, Santa Clara County, California. Alviso-Milpitas Road serves as an access road parallel to SR 237, connecting McCarthy Boulevard and Zanker Road. The project location lies directly north of SR 237 and east of Zanker Road. (See **Figure 1** below.)

LECEF is proposed for 18 acres of a 55-acre site that is, in turn, a portion of a 174-acre property that the City of San Jose recently annexed from an unincorporated section of Santa Clara County. In addition to the LECEF, the 174-acre parcel has planned uses which are in the development stage: the Pacific Gas & Electric (PG&E) Los Esteros Substation, and the planned US DataPort (USD) Planned Development Zoning Project (PDZ).[16] (Ex. 1, p.3-2.)

LECEF, in the Phase-I stage, is a proposed 180-megawatt (MW), natural gas-fired, simple-cycle power plant that would consist of four General Electric LM6000 Sprint Combustion Turbine Generators (CTG's). Each CTG would be contained in a metal acoustical enclosure with installed fire detection and suppression equipment. A single lube-oil cooler, a diesel-powered fire pump, and a 750-kW emergency natural gas-fired generator will service all four CTG's. Each CTG would generate a nominal 45MW under conditions specified by the California Independent System Operator (Cal-ISO). (Ex. 1, p. 3-2.).

The CTG inlet air is chilled for power augmentation. Water injection into the CTGs also augments power and lowers NOx formation during combustion. SCR systems at the exhaust stack transition will further control NOx at five parts per million by volume